

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE)	
CENTRE GMBH and WEST PUBLISHING)	
CORPORATION,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 20-613 (LPS)
)	
ROSS INTELLIGENCE INC.,)	
)	
Defendant.)	

**PLAINTIFFS' RENEWED MOTION TO DISMISS
DEFENDANT'S ANTITRUST AND STATE LAW COUNTERCLAIMS**

On January 25, 2021, Defendant ROSS Intelligence Inc. filed amended counterclaims. D.I. 24. On March 25, 2021, Plaintiffs Thomson Reuters Centre GmbH and West Publishing Corporation moved to dismiss with prejudice Defendant's Sherman Act and state law unfair competition counterclaims. D.I. 27 & 28. Defendant responded to Plaintiffs' motion to dismiss on April 22, 2021. D.I. 38. Plaintiffs will file their reply brief in support of their motion on May 13, 2021.

In the interim, on April 12, 2021, Defendant filed an Amended Answer and Defenses and Amended Counterclaims in Response to Plaintiffs' Complaint and Demand for Jury Trial. D.I. 36. Defendant's amended counterclaims, D.I. 36, are identical to its original amended counterclaims, D.I. 24.

To the extent necessary, and to avoid duplicative briefing, Plaintiffs renew their motion to dismiss Defendant's Sherman Act and state law unfair competition counterclaims, D.I. 27, and incorporate the related briefs by reference, D.I. 28.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn

OF COUNSEL:

Dale M. Cendali
Joshua L. Simmons
Eric A. Loverro
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
(212) 446-4800

Daniel E. Laytin
Christa C. Cottrell
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
(312) 862-2000

April 26, 2021

Jack B. Blumenfeld (#1014)
Michael J. Flynn (#5333)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@morrisnichols.com
mflynn@morrisnichols.com

*Attorneys for Plaintiffs Thomson Reuters
Enterprise Center GmbH and West Publishing
Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on April 26, 2021, upon the following in the manner indicated:

David E. Moore, Esquire
Stephanie E. O’Byrne, Esquire
POTTER ANDERSON & CORROON LLP
Hercules Plaza, 6th Floor
1313 North Market Street
Wilmington, DE 19801
Attorneys for Defendant

VIA ELECTRONIC MAIL

Joshua M. Rychlinski, Esquire
Mark A. Klapow, Esquire
Lisa Kimmel, Esquire
CROWELL & MORING LLP
1001 Pennsylvania Avenue NW
Washington, DC 20004
Attorneys for Defendant

VIA ELECTRONIC MAIL

Gabriel M. Ramsey, Esquire
Kayvan M. Ghaffari, Esquire
Jacob Canter, Esquire
Warrington Parker, Esquire
CROWELL & MORING LLP
3 Embarcadero Center, 26th Floor
San Francisco, CA 94111
Attorneys for Defendant

VIA ELECTRONIC MAIL

/s/ Michael J. Flynn

Michael J. Flynn (#5333)